

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

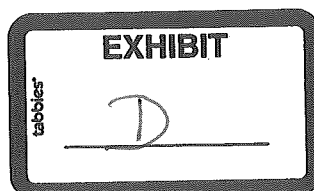
UNITED STATES OF AMERICA, :
 :
Plaintiff, : CIVIL ACTION NO. 2:13CV1133
 : JUDGE SARGUS
v. : Magistrate Judge Abel
 :
TWELVE THOUSAND SIX HUNDRED :
SIXTY-SEVEN AND 00/100 DOLLARS :
(\$12,667.00) IN UNITED STATES :
CURRENCY, :
 :
Defendant. :

DECLARATION OF ASSISTANT UNITED STATES ATTORNEY
DEBORAH F. SANDERS

I, Deborah F. Sanders, do hereby declare under penalty of perjury:

1. I am an Assistant United States Attorney for the Southern District of Ohio and represent Plaintiff, the United States of America, in the above-entitled action.


2. On March 11, 2014, I sent an email to Mr. Rutan's office advising him that the deadline to respond to the Special Interrogatories was March 7, 2014, and if I had not heard from him by March 21, 2014, either through receipt of the response or request for an extension of time to respond, that I would move for appropriate relief from the Court.



3. On March 12, 2014, Mr. Rutan responded via email to my March 11, 2013 email as follows "We are not providing anything. Good luck proving your case"

4. It should be noted, that on or about, January 22, 2014, a series of emails were exchanged regarding the Rule 26(f) Report. At that time Mr. Rutan informed me that he had no discovery to provide me.

5. To date, Enrique Alejandro Davidovich has failed to respond to the government's Special Interrogatories nor has counsel sought an extension.



DEBORAH F. SANDERS (0043575)
Assistant United States Attorney